

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	Chapter 7
)	
Amit Gauri,)	Case No. 21-03680
)	
Debtor.)	Hon. Janet S. Baer

NOTICE OF AMENDMENT TO TURNOVER MOTION

Catherine Steege, in her capacity as the chapter 7 trustee (the “**Trustee**”) for the estate of Amit Gauri (the “**Debtor**”), hereby amends her *Motion for Turnover of Property of the Estate* (the “**Turnover Motion**”) [Dkt. 450] and her *Combined Reply in Support of Motion for Turnover and Her Objection to Debtor’s Claimed Exemption in Post-Petition Wages* (the “**Turnover Reply**”) [Dkt. 494]. In support thereof, the Trustee respectfully states as follows:

1. On August 29, 2023, the Trustee filed her Turnover Motion seeking an order requiring the Debtor to turn over certain property of the estate. (Dkt. 450.)
2. On October 2, 2023, the Debtor filed his *Combined Response to Trustee’s Motion for Turnover of Property of the Estate and Objection to Debtor’s Claimed Exemption in Post-Petition Wages*. [Dkt. 473.] On December 19, 2023, the Trustee filed her Turnover Reply. [See Dkt. 494.]
3. On February 6, 2024, the Court held a status hearing and requested that the parties confer regarding the Turnover Motion. Following discussions with the Debtor’s counsel about the Excel chart the Debtor provided setting forth when he received certain amounts from his various companies and what period those amounts covered (attached as Exhibit A to Turnover Motion, Dkt. 450), the Trustee determined that the wages the Debtor earned during the chapter 11 case but received after his case was converted to a case under chapter 7 was not \$302,284.71 as set forth in the Turnover Motion but was \$105,362.84. Accordingly, the Trustee seeks to amend her Turnover

Motion and Turnover Reply to request recovery of \$105,362.84 in wages earned during the chapter 11 case that were not received until after the case converted.

4. To assist the Court, the Trustee also submits her *Summary of Relief Sought in Trustee's Motion for Turnover of Property of the Estate*, attached hereto as **Exhibit A**. This Summary details: (i) each asset the Trustee seeks and whether it is a pre-petition asset or an asset that became part of the estate during the Debtor's chapter 11 case; (ii) whether there is a dispute over an exemption; and (iii) when the Debtor received the asset and what the Trustee seeks to recover from the Debtor.

Dated: February 23, 2024

Respectfully submitted,

Catherine Steege, not individually but as
chapter 7 trustee for the estate of Amit
Gauri

By: /s/ Catherine Steege
One of her Attorneys

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CERTIFICATE OF SERVICE

I, Catherine Steege, the undersigned attorney, hereby certify that on February 23, 2024, I caused a copy of the *Notice of Amendment to Turnover Motion* to be filed via the Court's ECF system and by U.S. Mail as indicated below.

/s/ Catherine Steege

Catherine Steege

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